

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 20-cr-40036-TSH
)	
VINCENT KIEJZO,)	
)	
Defendant.)	

JOINT MOTION TO CONTINUE FINAL STATUS CONFERENCE

Now comes the United States of America and the defendant, Vincent Kiejzo, in a joint request that the final status conference scheduled for January 21, 2022 be rescheduled for a date after February 18, 2022. As reasons therefore, resolution of the defendant's appeal of the denial of his motion to compel discovery is still pending. (ECF #117) The hearing, previously scheduled for January 13, 2022, was continued until February 18, 2022 in order to accommodate an in-person hearing. (ECF #132) The resolution of discovery matters will enable the parties to more accurately report for a final status conference in this case as to the nature of, and time necessary to prepare and file, substantive motions. The government and the defendant agree that the period from Kiejzo's first appearance upon his indictment on October 2, 2020 through January 21, 2022, the date currently set for the final status conference, was properly excluded by this Court's prior orders on excludable delay. [ECF. 25,33, 37, 44, 48, 62, 70,72,86, 102,124,130]. The government and the defendant further agree that the time period between January 21,2022, and the final status conference should be excluded because the parties have been and are using the period of the continuance to complete production and review of discovery, and also to explore a non-trial disposition of the case. Therefore, the parties request that this Court find that the ends of justice served by excluding the period of this continuance

outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

VINCENT KIEJZO,
By his Attorney

/s/Sandra Gant
Sandra Gant
Assistant Federal Public Defender
P.O.Box 51268
Boston, MA 02205

Date: January 20, 2022

Respectfully submitted,

RACHAEL S. ROLLINS
UNITED STATES ATTORNEY

By:/s/Kristen M. Noto
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Kristen M. Noto
Kristen M. Noto
Assistant U.S. Attorney

Date: January 20, 2022

